

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN OF PENNSYLVANIA**

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

**THIS DOCUMENT RELATES TO:
ALL ACTIONS**

MOTION FOR RECONSIDERATION/NEW TRIAL

The Alexander Objectors and Lubel Voyles, LLP (hereinafter “Movants”) file this motion pursuant to Fed. R. Civ. P. 59 for reconsideration and/or a new trial in connection with the Court’s (i) Order/Memorandum Opinion (ECF 9860/9861) granting Class Counsel’s Fee Petition and requested 5% holdback (ECF 7151), and (ii) Order/Memorandum Opinion (ECF 9862/9863) presumptively limiting the effective IRPA fee recovery to 17%.

The Courts' Order/Memorandum Opinion (ECF 9860/9861) granting Class Counsel's Fee Petition and requested 5% holdback (ECF 7151), and the Court's Order/Memorandum Opinion (ECF 9862/9863) presumptively limiting the effective IRPA fee recovery to 17% contain separate but related obvious errors of law and fact. Under Federal Rule of Civil Procedure 59(a)(1)(B) and Fed. R. Civ. P. 59(e) these clear errors of law and fact have created a manifest injustice to the Class Members. For these reasons, and those set forth in Movants' Memorandum of Law in Support, the Court should grant a new trial on the fee award, fee hold back, and fee cap.

Dated: May 2, 2018

Respectfully Submitted,

/s/ Lance H. Lubel
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served on all counsel of record via the Court's ECF system on May 2, 2018.

/s/ Lance H. Lubel
Lance H. Lubel